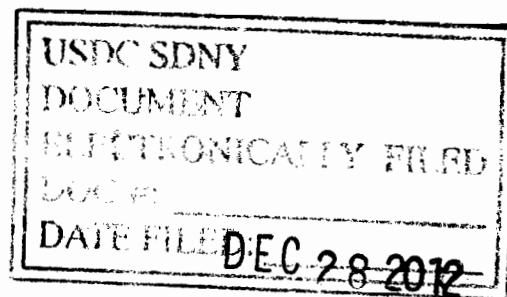


DANIEL S.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



United States of America,

Plaintiff,

-against-

Any and All Funds on Deposit at JPMorgan Chase
Account Number 61442003 Held in the Name of CIA
Minera Aurifera Santa Rosa SA, AKA COMARSA,
et. al,

Defendants-
In-Rem;

-and-

CIA Minera Aurifera Santa Rosa SA,

Claimant.

Civil Action No. 12-CV-7530 (GBD)

Joint Stipulation

JOINT STIPULATION

WHEREAS on December 7, 2012, claimant CIA Minera Aurifera Santa Rosa SA ("COMARSA") filed a notice of claim as to two defendants *in rem*;

WHEREAS pursuant to 18 U.S.C. § 983(a)(4)(B), COMARSA must file an answer or other responsive pleadings to the Government's complaint for forfeiture no later than 20 days after the date of the filing of the claim;

WHEREAS the Court has scheduled a status conference in this case for January 4, 2013, at 9:30 AM;

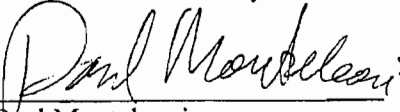
WHEREAS the parties have conferred, and have agreed that the deadline for filing an answer or any other responsive pleading should be postponed until after the status conference;

IT IS HEREBY STIPULATED THAT:


1. The deadline for COMARSA to file an answer or other responsive pleadings to the Government's complaint shall be no later than 21 days after the status conference on January 4, 2013, absent any other schedule the Court may set at the status conference.
2. This Stipulation represents the entire agreement of the parties and shall only be modified by written amendment.
3. This Stipulation may be executed in counterparts and transmitted by facsimile and/or electronic copy, each of which counterparts will be deemed to be an original and which taken together will constitute the Stipulation.

For the United States:
Dated: Dec 21, 2012

PREET BHARARA
United States Attorney

BY: 
Paul Monteleoni
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2219

For COMARSA:
Dated: Dec 21, 2012


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CHADBOURNE & PARKE LLP
1200 New Hampshire Ave., NW
Washington, DC 20036
(202) 974-5600

SO ORDERED:

DEC 23 2012

George B. Daniels

THE HONORABLE GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK